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Attorneys for Plaintiff, Natasha Piper

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

NATASHA PIPER, an individual,)	CASE NO: CV11-04550-SI
)	
PLAINTIFF,)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE CASE
v.)	MANAGEMENT CONFERENCE
)	
AT&T MOBILITY SERVICES LLC, a)	Date: January 27, 2012
Delaware Limited Liability Company; and)	Time: 2:30 p.m.
DOES 1-100, jointly and severally,)	Dept.: Courtroom 10
)	Judge: Honorable Susan Illston
DEFENDANTS.)	
_____)	

Pursuant to the Court's November 30, 2011 Order, a Case Management Conference in the above referenced matter was scheduled for January 27, 2012. The Order further required the parties to file a Joint Case Management Statement no later than January 20, 2012. For the reasons set forth below, Plaintiff respectfully requests that the Court continue the Case Management Conference scheduled for January 27, 2012 to March 16, 2012, at 2:30 p.m.

On October 6, 2011, counsel for AT&T Mobility Services LLC ("AT&T Mobility") advised Plaintiff's counsel that none of the four Defendants named in the Complaint were proper parties to this case, and further advised that, based on the allegations of the Complaint, the only entity which should have been named as a Defendant was his client, AT&T Mobility. In reliance on those representations, Plaintiff filed a First Amended Complaint on October 24, 2011, which removed all prior Defendants, and named the new, current, Defendant AT&T Mobility. Said Defendant was subsequently served on November 4, 2011 via Waiver of Service of Summons. On November 15,

1 2011 Plaintiff received the signed Waiver of Service from Defendant and filed the Proof of Service
2 with the Court. Defendant's answer to the complaint is due on January 3, 2012, and Plaintiff does
3 not anticipate the Defendant will appear until that date.

4 This case is one of approximately 93 pending cases which Plaintiff's counsel has filed
5 throughout the United States District Courts in California against Defendant AT&T Mobility on
6 behalf of current or former employees based on violations of the Fair Labor Standards Act.
7 Plaintiff's counsel and counsel for Defendant AT&T Mobility have spoken numerous times
8 regarding the legal issues involved in this case (and the other pending AT&T Mobility cases),
9 including anticipated discovery, and are working together to handle these cases in the most efficient,
10 cost-effective manner.

11 Given that the new Defendant has not yet appeared, is not obligated to appear, and will not
12 appear prior to January 3, 2012, Plaintiff believes that continuing the Case Management
13 Conference until March 16, 2012, would allow the only Defendant's counsel to appear, and provide
14 both parties ample and reasonable time to Meet and Confer and prepare the Joint Case Management
15 Statement prior to the Case Management Conference.

16 NOW, THEREFORE, subject to the Court's approval, Plaintiff, by and through her counsel
17 of record, respectfully asks the following:

18 1. That the Case Management Conference be continued from January 27, 2012, at 2:30
19 p.m., to March 16, 2012, at 2:30 p.m.; and

20 2. That the corresponding deadline to file the Joint Case Management Statement be
21 continued to March 9, 2012.
22

23 **GREEN BRYANT & FRENCH, LLP**

24 Dated: December 16, 2011

25 /s/ Joel R. Bryant
26 Joel R. Bryant, Esq.
27 Jbryant@gbflawyers.com
28 Attorney for Plaintiff
NATASHA PIPER

ORDER

IT IS ORDERED THAT:

1. The Case Management Conference is continued from January 27, 2012, at 2:30 p.m., to 3/9/12;
2. The deadline to file the Joint Case Management Statement is continued from January 20, 2012, to 3/2/12.

Dated: 12/23/11



Honorable Susan Illston